

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

FILED
U.S. DISTRICT COURT
MIDDLE DISTRICT OF TENN.
MAY 15 2024

UNITED STATES OF AMERICA

v.

GABRYELE WATSON

NO. 3:24-00098

18 U.S.C. § 875(c)

18 U.S.C. § 2261A(2)(B)

18 U.S.C. § 2261(b)


DEPUTY CLERK

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES:

Beginning on or about May 26, 2023, and continuing through at least on or about August 30, 2023, in the Middle District of Tennessee and elsewhere, the defendant, **GABRYELE WATSON**, with the intent to kill, injure, harass, and intimidate another person, that is, Victim One, did use an electronic communication service, and an electronic communication system of interstate commerce, and a facility of interstate and foreign commerce, to engage in a course of conduct that caused, attempted to cause, and would be reasonably expected to cause, substantial emotional distress to Victim One.

All in violation of Title 18, United States Code, Sections 2261A(2)(B) and 2261(b).

COUNT TWO

THE GRAND JURY FURTHER CHARGES:

Beginning on or about May 26, 2023, and continuing through at least on or about August 30, 2023, in the Middle District of Tennessee and elsewhere, the defendant, **GABRYELE WATSON**, with the intent to kill, injure, harass, and intimidate another person, that is, Victim Two, did use an electronic communication service, and an electronic communication system of

interstate commerce, and a facility of interstate and foreign commerce, to engage in a course of conduct that caused, attempted to cause, and would be reasonably expected to cause, substantial emotional distress to Victim Two.

All in violation of Title 18, United States Code, Sections 2261A(2)(B) and 2261(b).

COUNT THREE

THE GRAND JURY FURTHER CHARGES:

On or about June 7, 2023, in the Middle District of Tennessee and elsewhere, the defendant, **GABRYELE WATSON**, did knowingly and willfully transmit in interstate and foreign commerce a communicating to Victims One and Two, that is, text messages threatening to kidnap and injure Victims One and Two, including by sending a hitman to murder them.

In violation of Title 18, United States Code, Section 875(c).

FORFEITURE ALLEGATION

1. The allegations contained in this Indictment are re-alleged and incorporated by reference as if fully set forth in support of this forfeiture allegation.

2. Upon conviction Count Three, **GABRYELE WATSON** shall forfeit to the United States of America, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and 28 U.S.C. § 2461, any property, real or personal, which constitutes or is derived from proceeds traceable to the offense, including, but not limited to, a money judgment in an amount to be determined, representing the amount of proceeds traceable to the offense, including the value of any electronic devices seized from the residence of **GABRYELE WATSON** or her person.

4. If any of the property described above, as a result of any act or omission of **GABRYELE WATSON**:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;

- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States shall be entitled to forfeiture of substitute property, and it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of **GABRYELE WATSON**, up to the value of said property listed above as subject to forfeiture.

A TRUE BILL

FOREPERSON

HENRY C. LEVENTIS
UNITED STATES ATTORNEY


MONICA R. MORRISON
ASSISTANT UNITED STATES ATTORNEY